

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THANIA FERNANDEZ, on behalf of herself,  
individually, and on behalf of all others  
similarly-situated,

Plaintiff,

-against-

CATHOLIC GUARDIAN SERVICES f/k/a  
CATHOLIC GUARDIAN SOCIETY AND  
HOME BUREAU, and CRAIG LONGLEY,  
individually, GRACE POPPE, individually,  
and DOLOREZ ORTIZ, individually,

Defendants.

**Case No.: 17-cv-3161(ER)**

**DECLARATION OF  
CARYN ASHARE**

Caryn Ashare, Esq. declares under the penalty of perjury that the following is true and correct:

1. I am over eighteen years of age and are Chief Program Officer at Catholic Guardian Services (“CGS”). I have held this position since on or about May 2013. In my role, I am responsible for all of CGS’s programs, including the Foster Boarding Home (“FBH”) and Unaccompanied Aliens Children (“UAC”) programs. As such I am fully familiar with the programs at issue here.

2. I have a Masters’ of Social Work (MSW), and am familiar with the educational requirements of the Caseworker and Case Manager positions. Both positions require, at a minimum, bachelor’s degrees in social work or related fields. Related course work is required, and a generalized course of social science study is insufficient to qualify for one of these positions. Other work experience or training, is also relevant, indeed required for Case Managers in UAC.

3. CGS's UAC Program provides shelter and care for unaccompanied minors from foreign countries, through a partnership with the U.S. Office of Refugee Resettlement ("ORR") Program. Many of these minors are sent to the United States by their families to escape poverty or abuse in various forms, such as persecution, human trafficking, gangs and forced labor. The UAC children are not U.S. citizens and have been apprehended by immigration officials or other authorities while traveling alone or without an adult.

4. The UAC children are typically under the care of CGS for 30-60 days during which CGS Case Managers and their team attempt to locate a U.S.-based "sponsor" – typically a parent, family member, or family friend – with whom the child can live pending the final outcome of legal proceedings involving their immigration status.

5. UAC Case Managers are required by the U.S. Office of Refugee Resettlement ("ORR") to undergo specific training prior to serving as a Case Manager in a UAC program. Plaintiff Fernandez and all other Case Managers have taken such training.

6. The ORR training includes areas such as:

- Behavior management approaches
- Non-violent restraint techniques
- Immigration and child welfare systems
- Child Development Theory
- Loss and family separation
- Common health and mental health diagnoses
- First Aid/CPR
- Child trafficking and smuggling
- Child abuse reporting requirements

Dated: New York, New York  
September 14, 2017

  
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CARYN ASHARE